

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of

Proposed Transfer of Control of T-Mobile USA, Inc. to AT&T Inc.:
WT Docket No.11-65

COMMENTS
Submitted on behalf of Consumer Policy Solutions
(and the Consumer Awareness Project)
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President

May 25, 2011

Introduction

As President of Consumer Policy Solutions and director of the Consumer Awareness Project, I appreciate the opportunity to offer these comments to the Federal Communications Commission (“Commission”) in the matter of the proposed transfer of control of T-Mobile USA, Inc. to AT&T Inc.:

As the FCC evaluates the proposed AT&T merger with T-Mobile, it will likely consider multiple areas that impact consumers. As a long-time advocate of a diverse consumer interest in the communications marketplace, I urge you to consider the benefits this merger will bring in multiple areas, particularly the following three benefits these comments will highlight:

- 1) Expanded 4G-LTE broadband services.
- 2) Access to advanced services for healthcare, education, and special needs.
- 3) Online privacy and data security.

Discussion

The Commission should consider the following consumer benefits of the proposed mergers:

1) Expanded 4G-LTE broadband services.

For the millions of Americans without access to true high-speed Internet service, particularly those living in rural areas, the proposed merger will bring the next generation of 4G LTE broadband services. As it is likely known, T-Mobile’s parent

company, Deutsche Telekom, did not have definitive plans to deploy 4G/LTE or 4G/WiMAX here in the U.S. AT&T is already moving forward on a 4G/LTE deployment and has committed *an additional \$8 billion in investment if the merger is approved.*

Through the proposed acquisition and AT&T's deployment of 4G LTE, coverage will extend to an additional 55 million Americans and reach more than 1 million additional square miles beyond the company's current plans – ultimately connecting 97% of Americans. Most importantly, these plans will bring the benefits of LTE technology, including faster speeds and reliable performance, to more people in rural communities and those with little or no access to broadband.

As indicated in the FCC's latest Broadband Report to Congress, approximately 26 million Americans, mostly located in rural communities across the U.S., do not have access to broadband. AT&T's deployment of 4G LTE technology will help bring broadband access to these consumers.

2) Access to advanced services for healthcare, education and special needs.

The benefits for Internet users – especially those without access to wired broadband connections – will be substantial. The ubiquity of the wireless Internet brings with it so many benefits: healthcare access, education, instant communication. For consumers, 4G access is a route to better, more productive lives.

A greater number of consumers will also be able to realize the benefits of telehealth and online learning through the deployment of 4G technology. Faster broadband access will enable consumers to connect remotely with their physicians and find additional benefits for better medical care. Virtual and online learning opportunities for school age children will also increase – especially in rural and other small communities across the U.S.

Additionally, those with special needs will be able to explore broadband in ways that benefit them the most – more quickly and easily with 4G LTE technology.

3) Online Privacy and Data Security.

Online privacy and data security is an important consumer issue and a concern that can be addressed in the context of this merger. AT&T has taken a lead role in educating consumers about guarding their online privacy. Before the rest of the industry, it adopted standards for transparency and control of personal data. As more of our daily lives are conducted online, privacy protection is increasingly important and AT&T has set a good standard in this area.

Keeping up with the latest security protection for the Internet and smart phones is a moving target and it is critical for the protection of consumers.

Consumer Policy Solutions, through its Consumer Awareness Project, has been working to help educate and inform consumers about the necessary steps to keep themselves secure in the digital world. Wireless providers such as AT&T have been industry leaders when it comes to security issues for consumers. AT&T has worked diligently with consumers, members of the industry, government agencies and non-profit organizations to communicate simple steps consumers can take to protect themselves online. The joint resources of the merged company will help promote a safer, more secure network for consumers.

This merger provides an opportunity to provide a more integrated approach to online security and I urge the Commission to recognize this as an important value of the merger for consumers.

Conclusion

For all these reasons, I encourage the Commission to approve the T-Mobile/AT&T merger.

Thank you for the opportunity to offer these comments. I look forward to working with the Commission on this issue.